

LUMORA

MENTAL WEALTH SOLUTIONS

Operated by Capital Five Consulting (Pty) Ltd

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Date of Compilation: October 2026

Version: 1.0

Information Regulator Registration No.: 2026-016985

1. LIST OF ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
PAIA	Promotion of Access to Information Act 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
EAP	Employee Assistance Programme

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual is compiled in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended. It enables members of the public to:

1. Check categories of records held by Capital Five Consulting (Pty) Ltd that are available without a formal PAIA request;
2. Understand how to submit a formal request for access to records;
3. Identify records available under other legislation;
4. Access full contact details of the Information Officer;
5. Understand how personal information is processed in terms of POPIA;
6. Know the security measures in place to protect personal information.

3. KEY CONTACT DETAILS

3.1 Information Officer

Full Name: Lauren Thompson

Title: Chief Executive Officer

Organisation: Capital Five Consulting (Pty) Ltd (trading as Lumora)

Email: info@capitalfive.co.za

Telephone: +27 76 523 1057

Postal Address: 57 Holly Oaks Estate, 105 Hyperion Drive, Northriding, Johannesburg, 2169

Physical Address: 57 Holly Oaks Estate, 105 Hyperion Drive, Northriding, Johannesburg, 2169

IO Appointment Date: 25 July 2025

IR Registration Number: 2026-016985

3.2 Deputy Information Officer

Capital Five Consulting (Pty) Ltd has not designated a Deputy Information Officer at this time. All access-to-information requests are handled directly by the Information Officer above.

3.3 General Access to Information Contacts

Email: info@capitalfive.co.za

Privacy / POPIA queries: privacy@capitalfive.co.za

Website: www.lumora.co.za

3.4 National / Head Office

Postal Address: 57 Holly Oaks Estate, 105 Hyperion Drive, Northriding, Johannesburg, 2169

Physical Address: 57 Holly Oaks Estate, 105 Hyperion Drive, Northriding, Johannesburg, 2169

Telephone: +27 76 523 1057

Email: info@capitalfive.co.za

Website: www.capitalfive.co.za

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has, in terms of Section 10(1) of PAIA, updated and made available a revised Guide on how to use PAIA ("the Guide") in an easily comprehensible form, as reasonably required by persons wishing to exercise rights under PAIA and POPIA.

The Guide is available in all official languages and in braille. Members of the public may:

1. Inspect or obtain a copy from the offices of the Information Regulator during normal business hours;
2. Download the Guide from: <https://www.justice.gov.za/inforeg/>;
3. Request a copy from the Information Officer of Capital Five Consulting (Pty) Ltd.

A copy of the Guide is available for public inspection in English and Zulu during normal business hours at the registered office of Capital Five Consulting (Pty) Ltd.

5. CATEGORIES OF RECORDS AVAILABLE WITHOUT A PAIA REQUEST

The following records are available without requiring a formal PAIA request and may be accessed via the website or upon request:

Category of Records	Type of Record	Available on Website	Available on Request
Privacy Policy	POPIA / Data Processing Policy	Yes	Yes
Terms and Conditions	Platform Terms of Use	Yes	Yes
PAIA Manual	Compliance Document	Yes	Yes
Pricing Information	Employer Package Information	Yes	Yes
Contact Information	General Company Contact Details	Yes	Yes
Cookie Policy	Website Cookie Notice	Yes	Yes

6. RECORDS AVAILABLE UNDER OTHER LEGISLATION

The following records are held or created in terms of applicable South African legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI)	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Employment Contracts	Labour Relations Act 66 of 1995; Basic Conditions of Employment Act 75 of 1997
Payroll and Tax Records	Income Tax Act 58 of 1962; Skills Development Levies Act 9 of 1999
VAT Records	Value-Added Tax Act 89 of 1991
Health and Safety Records	Occupational Health and Safety Act 85 of 1993
Data Processing Agreements	Protection of Personal Information Act 4 of 2013
Financial Statements	Companies Act 71 of 2008
POPIA Registration	Protection of Personal Information Act 4 of 2013

7. SUBJECTS AND CATEGORIES OF RECORDS HELD

Capital Five Consulting (Pty) Ltd holds records in the following subject areas:

Subject Area	Categories of Records Held
Corporate Governance	MOI, Shareholder agreements, Board resolutions, Company registration documents
Human Resources	Employment contracts, Leave records, Payroll records, Performance records, Training records, BEE / EE documentation
Finance and Accounting	Annual financial statements, Bank records, Tax returns (VAT, PAYE, corporate tax), Invoices and receipts
Information Technology	System architecture documentation, Security policies, Data processing agreements, Software licences
Platform Operations (Lumora App)	Employer account records, Employee wellness records (pseudonymised), Provider profiles and qualifications, Booking and session records, Payment records
Legal and Compliance	Contracts with clients and service providers, Insurance policies, PAIA Manual, POPIA compliance records
Marketing and Communications	Campaign records, Email correspondence, Social media records
Client / Employer Records	Employer onboarding documentation, Subscription agreements, Employee invitation records
Provider Records	Provider applications, Qualification certificates, ID documents, Service agreements, Payment / billing records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Capital Five Consulting (Pty) Ltd (trading as Lumora) operates a digital mental wellness platform that connects employer organisations with mental health and wellness service providers. Personal information is processed for the following purposes:

1. Registering and managing employer organisation accounts;
2. Registering and managing employee beneficiary accounts;
3. Registering, vetting, and managing provider (therapist / wellness practitioner) profiles;
4. Facilitating the booking and delivery of mental wellness services;
5. Processing payments to providers and from employers;
6. Communicating with users regarding platform updates, bookings, and wellness content;
7. Complying with legal obligations under PAIA, POPIA, tax legislation, and labour law;
8. Anonymised or aggregated analytics to improve platform services (no individual is identifiable).

8.2 Categories of Data Subjects and Personal Information Processed

Category of Data Subject	Personal Information Processed
Employer Organisations	Company name, registration number, VAT number, postal and physical address, contact person details (name, email, phone), billing information, employee headcount
Employee Beneficiaries	Full name, email address, employment details (employer name, job level), wellness engagement data (sessions booked, platform usage — anonymised in reporting), Lumora balance / credits, invitation status
Mental Health & Wellness Providers	Full name, ID / passport number, qualifications and professional registration numbers, contact details, physical location and practice address, banking details, service offerings, rates, session records, document uploads (certificates, ID copies)
Website / Platform Visitors	IP address, browser type, cookie identifiers (where consent is given), contact form submissions
Employees of Capital Five Consulting	Name, ID number, contact details, qualifications, employment contract details, payroll information, tax information

8.3 Recipients of Personal Information

Personal information may be shared with the following categories of recipients:

Category of Personal Information	Recipient / Category of Recipients
Employee session bookings	Mental health / wellness provider (name and booking details only)
Provider identity and qualification verification	Internal compliance team; South African Qualifications Authority (SAQA) where applicable

Payment processing	PayFast (Pty) Ltd — payment gateway — for transaction processing
Email communications	Resend Inc. — transactional email service provider
Platform hosting and data storage	Supabase Inc. / Vercel Inc. — cloud infrastructure providers (see Section 8.4)
Legal and regulatory compliance	Information Regulator; South African Revenue Service (SARS); courts of law, where legally required
Tax and payroll	SARS; registered auditors / accountants of Capital Five Consulting

8.4 Planned Transborder Flows of Personal Information

Capital Five Consulting (Pty) Ltd uses the following international service providers, which may result in personal information being stored or processed outside the Republic of South Africa:

Service Provider	Country / Region	Personal Information Involved	Safeguard
Supabase Inc.	United States (AWS infrastructure)	All platform user data (employer, employee, provider records)	Standard Contractual Clauses; encryption in transit and at rest
Vercel Inc.	United States / Global CDN	Application code; session tokens	Standard Contractual Clauses; no raw personal data stored
Resend Inc.	United States	Email address, name (for transactional emails only)	Standard Contractual Clauses; data minimisation

Capital Five Consulting (Pty) Ltd ensures that appropriate safeguards are in place for all transborder transfers, in compliance with Section 72 of POPIA.

8.5 Information Security Measures

Capital Five Consulting (Pty) Ltd implements the following security measures to protect the confidentiality, integrity, and availability of personal information:

1. Data encryption in transit (TLS 1.2+) and at rest (AES-256) for all stored personal data;
2. Row-Level Security (RLS) enforced at the database layer — users can only access records they are authorised to view;
3. Password hashing using industry-standard bcrypt algorithms — plaintext passwords are never stored;
4. Role-based access control (RBAC) — platform access is segmented by role (Employee, Employer, Provider, Admin);
5. Multi-factor authentication (MFA) available for administrative accounts;
6. Regular automated security dependency scanning and vulnerability patching;
7. Access logs and audit trails maintained for administrative actions;
8. Data minimisation — only personal information necessary for the stated purpose is collected and retained.

9. AVAILABILITY OF THIS MANUAL

A copy of this PAIA Manual is available:

1. On the Lumora website: www.lumora.co.za (downloadable PDF in the footer);
2. For public inspection at the registered office of Capital Five Consulting (Pty) Ltd during normal business hours (Monday to Friday, 08:00–17:00);
3. To any person upon written request to the Information Officer, subject to payment of the prescribed copy fee as set out in the PAIA Regulations (R1.10 per A4 page);
4. To the Information Regulator upon request.

10. UPDATING OF THIS MANUAL

The Information Officer of Capital Five Consulting (Pty) Ltd will review and update this Manual at least annually, or whenever there is a material change to the organisation's data processing activities, structure, or applicable legislation. The date of each revision will be recorded on the cover page.

Issued by:



Name: Lauren Thompson

Title: Information Officer / Chief Executive Officer

Organisation: Capital Five Consulting (Pty) Ltd

Date: 16 October 2026